

EXHIBIT A



**Service of Process
Transmittal**

08/02/2021

CT Log Number 540002337

TO: Kim Lundy- Email
Walmart Inc.
702 SW 8TH ST
BENTONVILLE, AR 72716-6209

RE: Process Served in New Jersey

FOR: WALMART INC. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Mjumbe Kayren Carter and Lukata Mjumbe, etc., Pltfs. vs. Walmart Inc., et al., Dfts.

DOCUMENT(S) SERVED: Summons, Attachment(s), Complaint, Demand, Interrogatories, Statement

COURT/AGENCY: Mercer County - New Jersey Superior Court - Law Division, NJ
Case # MERL010150921

NATURE OF ACTION: Personal Injury - Slip/Trip and Fall - 08/12/2019 at Nassau Park Boulevard, Township of Princeton, County of Mercer, NJ

ON WHOM PROCESS WAS SERVED: C T Corporation System, West Trenton, NJ

DATE AND HOUR OF SERVICE: By Process Server on 08/02/2021 at 13:07

JURISDICTION SERVED : New Jersey

APPEARANCE OR ANSWER DUE: Within 35 days from receipt, not counting the day of receipt (Document(s) may contain additional answer dates)

ATTORNEY(S) / SENDER(S): Evan J. Lide
Stark & Stark
P.O. Box 5315
Princeton, NJ 08543-5315
(609) 896-9060

ACTION ITEMS: CT has retained the current log, Retain Date: 08/02/2021, Expected Purge Date: 08/07/2021

Image SOP

REGISTERED AGENT ADDRESS: C T Corporation System
820 Bear Tavern Road
West Trenton, NJ 08628
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

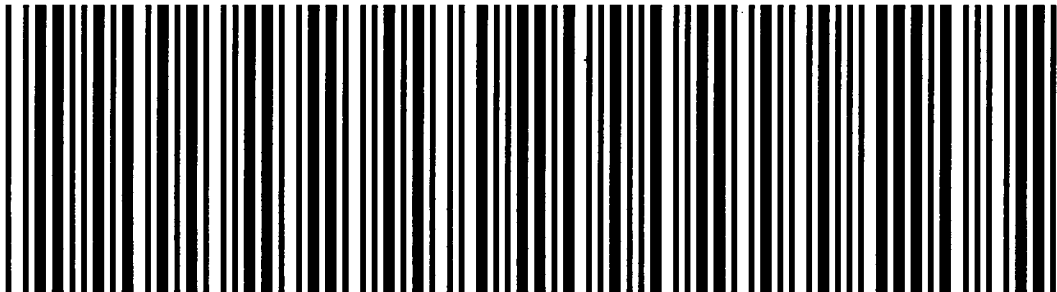


PROCESS SERVER DELIVERY DETAILS

Date: Mon, Aug 2, 2021

Server Name: Drop Service

Entity Served	WALMART INC.
Case Number	MERL010150921
Jurisdiction	NJ



STARK & STARK
A Professional Corporation
Mailing Address: PO Box 5315, Princeton, NJ 08543
Office Location: 993 Lenox Drive, Lawrenceville, NJ 08648
609.896.9060
Evan J. Lide, Esq.
Attorney ID#: 003422007
Attorneys for Plaintiff

KAYREN CARTER-MJUMBE AND
LUKATA MJUMBE (W/H),

Plaintiff

vs.

WALMART INC.; ABC COMPANIES 1-10
(FICTITIOUS DESIGNATIONS); AND XYZ
CLEANERS 1-10(FICTITIOUS DESIGNATIONS),

Defendants

SUPERIOR COURT OF NEW JERSEY
MERCER COUNTY
LAW DIVISION

Docket No. MER-L-0101509-21

CIVIL ACTION

SUMMONS

From The State of New Jersey to The Defendant(s) Named Above: Walmart

The plaintiff named above has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each Deputy Clerk of the Superior Court is available in the Civil Division Management Office in the County listed above and online at https://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney, whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live, or the Legal Services of New Jersey Statewide Hotline, at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at https://www.njcourts.gov/forms/10153_deptyclerklawref.pdf.

STARK & STARK
ATTORNEYS AT LAW

DATED: July 23, 2021

/s/ Michelle M. Smith

Michelle M. Smith
Clerk of the Superior Court

Name of Defendant to be served: Walmart
Address of Defendant to be served: 101 Nassau Park Boulevard
Princeton, NJ 08643

Directory of Superior Court Deputy Clerk's Offices County Lawyer Referral and Legal Services Offices

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401
LAWYER REFERRAL
(609) 345-3444
LEGAL SERVICES
(609) 348-4200

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102
LAWYER REFERRAL
(973) 622-6204
LEGAL SERVICES
(973) 624-4500

MONMOUTH COUNTY:

Deputy Clerk of the Superior Court
Court House
P.O. Box 1269
Freehold, NJ 07728-1269
LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601
LAWYER REFERRAL
(201) 488-0044
LEGAL SERVICES
(201) 487-2166

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street
Woodbury, NJ 08096
LAWYER REFERRAL
(856) 848-4589
LEGAL SERVICES
(856) 848-5360

MORRIS COUNTY:

Morris County Courthouse
Civil Division
Washington and Court Streets
P.O. Box 910
Morristown, NJ 07963-0910
LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073
LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060
LAWYER REFERRAL
(609) 261-4862
LEGAL SERVICES
(609) 261-1088

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House—1st Floor
583 Newark Ave.
Jersey City, NJ 07306
LAWYER REFERRAL
(201) 798-2727
LEGAL SERVICES
(201) 792-6363

OCEAN COUNTY:

Deputy Clerk of the Superior Court
118 Washington Street, Room 121
P.O. Box 2191
Toms River, NJ 08754-2191
LAWYER REFERRAL
(732) 240-3666
LEGAL SERVICES
(732) 341-2727

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500
LAWYER REFERRAL
(908) 859-4300
LEGAL SERVICES
(908) 475-2010

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 5th Street
Camden, NJ 08103
LAWYER REFERRAL
(856) 482-0618
LEGAL SERVICES
(856) 964-2010

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822
LAWYER REFERRAL
(908) 236-6109
LEGAL SERVICES
(908) 782-7979

PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505
LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210
LAWYER REFERRAL
(609) 463-0313
LEGAL SERVICES
(609) 465-3001

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650
LAWYER REFERRAL
(609) 585-6200
LEGAL SERVICES
(609) 695-6249

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079
LAWYER REFERRAL
(856) 935-5629
LEGAL SERVICES
(856) 691-0494

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302
LAWYER REFERRAL
(856) 696-5550
LEGAL SERVICES
(856) 691-0494

MIDDLESEX COUNTY:

Deputy Clerk of the Superior Court
Middlesex Vicinage
2nd Floor - Tower
56 Paterson Street, P.O. Box 2633
New Brunswick, NJ 08903-2633
LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876
LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

MERCER COUNTY COURTHOUSE
CIVIL CASE MANAGMENT OFFICE
175 SOUTH BROAD ST P O BOX 8068
TRENTON NJ 08650-0068

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 571-4200
COURT HOURS 8:30 AM - 4:30 PM

DATE: JULY 22, 2021
RE: CARTER-MJUMBE KAYREN VS WALMART INC
DOCKET: MER L -001509 21

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON WILLIAM X. ANKLOWITZ

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 020
AT: (609) 571-4200 EXT 74454.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: EVAN J. LIDE
STARK & STARK PC
993 LENOX DR
LAWRENCEVILLE NJ 08648

ECOURTS

STARK & STARK
A Professional Corporation
Attorneys at Law
Princeton Pike Corporate Center
993 Lenox Drive, Building 2
P.O. Box 5315
Princeton, NJ 08543-5315
(609) 896-9060
Attorneys for Plaintiffs
By: Evan J. Lide, Esq. (00342-2007)

KAYREN CARTER-MJUMBE and
LUKATA MJUMBE (w/h),

Plaintiffs,

vs.

WALMART INC.; ABC COMPANIES 1-10
(fictitious designations); and XYZ
CLEANERS 1-10 (fictitious designations),

Defendants.

SUPERIOR COURT OF NEW JERSEY
MERCER COUNTY
LAW DIVISION

Docket No.

CIVIL ACTION

COMPLAINT AND JURY DEMAND

DEMAND FOR ANSWERS TO
INTERROGATORIES

Plaintiffs, KAYREN CARTER-MJUMBE and LUKATA MJUMBE (w/h), residing together at 453 Walnut Lane, in the Township of Princeton, County of Mercer, and State of New Jersey, by way of Complaint, say:

FIRST COUNT

1. On or about August 12, 2019, Plaintiff, KAYREN CARTER-MJUMBE, was lawfully on the premises then-known as Walmart Nassau Park, located at 101 Nassau Park Boulevard, in the Township of Princeton, County of Mercer, and State of New Jersey.

2. At the same time, the aforesaid premises was owned, possessed, controlled, cleaned and/or maintained by Defendants, WALMART INC.; ABC COMPANIES 1-10 (fictitious designations); and XYZ CLEANERS 1-10 (fictitious designations).

3. At present, the identity(ies) of Defendants, ABC COMPANIES 1-10 and/or XYZ CLEANERS 1-10, are unknown. As such, "ABC COMPANIES 1-10" and "XYZ CLEANERS 1-10", are fictitious designations, representing one or more individual(s), sole proprietorship(s),

association(s), limited partnership(s), general partnership(s), limited liability company(ies) and/or corporation(s), which in any way owned, possessed, controlled, designed, cleaned, or maintained any part of the premises then-known as Walmart Nassau Park.

4. At the same time and place, Plaintiff, KAYREN CARTER-MJUMBE, while shopping in the cosmetics aisle of the premises then-known as Walmart Nassau Park, was caused to trip and fall due to a dangerous and defective condition on the aisle floor, which appeared to be some sort of wet substance.

5. The aforesaid occurrence was caused by the negligence of Defendants, WALMART INC.; ABC COMPANIES 1-10 (fictitious designations); and XYZ CLEANERS 1-10 (fictitious designations), their agents, servants and employees, in creating the aforesaid condition; in permitting the aforesaid condition to exist despite actual or constructive notice; in failing to warn against the existence of the aforesaid condition despite actual or constructive notice; in failing to maintain the premises; in failing to make proper and timely inspections of the premises; in failing to provide safe walking conditions and safe passageway for persons allowed on and invited to use the aforesaid premises; and otherwise in failing to exercise due care under the circumstances.

8. As a result of the carelessness, recklessness, and negligence of Defendants, WALMART INC.; ABC COMPANIES 1-10 (fictitious designations); and XYZ CLEANERS 1-10 (fictitious designations), their agents, servants and employees, and their disregard for the safety of others, Plaintiff, KAYREN CARTER-MJUMBE, was caused to suffer severe bodily injuries, some of which are permanent in nature; has been caused to aggravate any pre-existing medical condition, symptomatic and/or asymptomatic, which is permanent; has been caused and will be caused to expend large sums of money for medical treatment necessary to effect a cure for her injuries; has been caused and will in the future be caused great pain and suffering; has been caused and will in the future be caused to be unable to pursue her usual activities; and has been and will in the future be caused to lose large sums of money due to her inability to pursue her usual occupation.

WHEREFORE, Plaintiff, KAYREN CARTER-MJUMBE, demands Judgment for damages generally against the Defendants, WALMART INC.; ABC COMPANIES 1-10 (fictitious designations); and XYZ CLEANERS 1-10 (fictitious designations), individually, jointly, severally, or in the alternative, together with interest and costs of suit.

SECOND COUNT

1. Plaintiff, LUKATA MJUMBE, is the husband of Plaintiff, KAYREN CARTER-MJUMBE.

2. Plaintiff, LUKATA MJUMBE, incorporates by reference the allegations contained in the previous paragraphs of the Complaint as though fully set forth herein at length.

3. As a further direct and proximate result of the carelessness, recklessness, and negligence of the Defendants, WALMART INC.; ABC COMPANIES 1-10 (fictitious designations); and XYZ CLEANERS 1-10 (fictitious designations), and their disregard for the safety of others, Plaintiff, LUKATA MJUMBE, has been caused and will be caused to lose the services of his dear wife, and has been caused and will be caused to suffer loss of consortium.

WHEREFORE, Plaintiff, LUKATA MJUMBE, demands Judgment for damages generally against Defendants, WALMART INC.; ABC COMPANIES 1-10 (fictitious designations); and XYZ CLEANERS 1-10 (fictitious designations), individually, jointly, severally, or in the alternative, together with interest and costs of suit.

STARK & STARK
A Professional Corporation
Attorneys for Plaintiffs

By: Evan J. Lide
EVAN J. LIDE

JURY DEMAND

Plaintiffs, KAYREN CARTER-MJUMBE and LUKATA MJUMBE, hereby demand a trial by jury as to all issues.

STARK & STARK
ATTORNEYS AT LAW

CERTIFICATION OF OTHER ACTIONS/PARTIES

Pursuant to the provisions of Rule 4:5-1, the undersigned attorney certifies that this matter is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated, and all known necessary parties have been joined in this action.

CERTIFICATION OF COMPLIANCE WITH RULE 1:38-7(c)(1)

Pursuant to Rule 1:38-7(b), all confidential identifiers of the parties to this action have or will be redacted from all documents or pleadings submitted to the court.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of Rule 4:25-4 the Court is advised that EVAN J. LIDE is hereby designated as trial counsel.

DEMAND FOR ANSWERS TO INTERROGATORIES
& SUPPLEMENTAL INTERROGATORIES

Plaintiffs, KAYREN CARTER-MJUMBE and LUKATA MJUMBE, demand that Defendant, WALMART INC., provide answers to interrogatories as follows:

FORM C and FORM C(2) UNIFORM INTERROGATORIES, as set forth in Appendix II of the New Jersey Court Rules effective September 1, 2008.

SUPPLEMENTAL INTERROGATORIES #1-10.

STARK & STARK
A Professional Corporation
Attorneys for Plaintiffs

By: Evan J. Lide

EVAN J. LIDE

Dated: July 22, 2021

STARK & STARK
ATTORNEYS AT LAW

STARK & STARK
A Professional Corporation
Attorneys at Law
Princeton Pike Corporate Center
993 Lenox Drive, Building 2
P.O. Box 5315
Princeton, NJ 08543-5315
(609) 896-9060
Attorneys for Plaintiffs
By: Evan J. Lide, Esq. (00342-2007)

KAYREN CARTER-MJUMBE and
LUKATA MJUMBE (w/h),

Plaintiffs,

vs.

WALMART INC.; ABC COMPANIES 1-10
(fictitious designations); and XYZ
CLEANERS 1-10 (fictitious designations,

Defendants.

SUPERIOR COURT OF NEW JERSEY
MERCER COUNTY
LAW DIVISION

Docket No.

CIVIL ACTION

DEMAND FOR DISCOVERY
OF INSURANCE COVERAGE

To: WALMART INC.

Pursuant to Rule 4:10-2(b), demand is hereby made that you disclose to the undersigned whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.
YES () NO ()

If the answer is "yes" attach a copy of each or in the alternative state, under oath or certification (a) number (b) name and address of insurer or issuer (c) inception of expiration dates (d) names and addresses of all persons insured thereunder (e) personal injury limits (f) property damage limits (g) medical payment limits (h) name and address of person who has custody and possession thereof (i) where and when each policy or agreement can be inspected and copied.

Dated: _____

STARK & STARK
ATTORNEYS AT LAW

STARK & STARK
A Professional Corporation
Attorneys at Law
Princeton Pike Corporate Center
993 Lenox Drive, Building 2
P.O. Box 5315
Princeton, NJ 08543-5315
(609) 896-9060
Attorneys for Plaintiffs
By: Evan J. Lide, Esq. (00342-2007)

KAYREN CARTER-MJUMBE and
LUKATA MJUMBE (w/h),

Plaintiffs,

vs.

WALMART INC.; ABC COMPANIES 1-10
(fictitious designations); and XYZ
CLEANERS 1-10 (fictitious designations,

Defendants.

SUPERIOR COURT OF NEW JERSEY
MERCER COUNTY
LAW DIVISION

Docket No.

CIVIL ACTION

PRODUCTION OF DOCUMENTS

TO: WALMART INC.

Pursuant to Rule 4:18-1, plaintiffs request production of the following documents from
the defendant:

1. Please produce the deed showing defendant's ownership interest in the premises
as of the date of this incident.

STARK & STARK
ATTORNEYS AT LAW

2. Attach hereto any and all maintenance records or log book or other similar documents generated by the defendant for the one year period prior to plaintiff's accident and one month subsequent to plaintiff's accident.

3. Attach hereto a copy of any training materials or documents with respect to the inspection procedure to be utilized by the defendant employees or training manual with respect to the inspection or maintenance of the defendant premises.

4. Attach hereto any diary, log book or similar written record that describes the day to day events that take place at defendant's premises.

5. Attach hereto copies of incident reports, pleadings, interrogatories, and deposition transcripts from any incident, claim or lawsuit which has ever arisen out of an injury sustained on defendant's premises from slipping, tripping, or other alleged acts of improper design, maintenance, inspection, or construction.

6. Attach a copy of all incident reports concerning plaintiff's claim.

7. Attach a copy of any excess insurance policy.

8. Please produce the following in regard to any surveillance conducted of the Plaintiff:

a) Any and all logs, notes, audio tapes, invoices, billing receipts or documents that were kept concerning the filming of the videotapes or other surveillance that did not result in videotape.

b) A list of all teams, members and other personnel involved in the filming of the videotapes along with the times those individuals were involved in the taping, the location of those individuals were involved in the taping, the location of those individuals at the time of the taping and what, if anything, those individuals were instructed to observe.

c) A list of all people involved in the editing and/or copying, and/or transferring of the videotapes along with the times they worked on said videotapes and a detailed description of what they edited to include:

- i) Portions of original tape removed;
 - ii) Voice-overs;
 - iii) Portions of the tape clarified;
 - iv) Any other editing job performed by these individuals.
- d) A list of all people speaking on the tapes and what times those people were present for filming or editing.
- e) A description of what is contained on the videotapes.
- f) An explanation of what is contained on the videotapes.
- g) A detailed explanation of what the defendant claims is shown by the videotapes.
- h) A labeled set of videotapes with each tape marked as to its contents.
- i) A list of all people associated with the filming, editing, production, viewing, delivery and otherwise involved in any manner with the videotapes and when each person was involved with said tapes and what they did with or to said tapes.
- j) A list of all the equipment used in the filming of the videotapes including the model numbers of such equipment.
- k) All correspondence regarding the videotaped surveillance and any other surveillance which may have resulted in videotape.
- l) All still photographs.

9. If you allege any of the injuries plaintiff contends were caused by the incident in issue were not caused by incident/accident, please produce the following documents:

- a) Copies of all medical reports and documents upon which you rely;
- b) Copies of any and all pleadings, interrogatories, depositions or trial transcripts or any other records upon which you will rely.

10. If you allege the plaintiff has been involved in any previous or subsequent accidents or incidents or sustained any previous or subsequent injuries to those in question, please produce the following:

- a) Copies of all medical reports and documents upon which you will rely;
- b) Copies of any pleadings, interrogatories, depositions, trial testimony or any other records upon which you will rely.

11. If you intend to cross-examine any of the plaintiff's experts by use of any medical or scientific treatises or any treatises, please attach copies of said documents.

12. Please attach copies of any photographs, videos, surveillance films, audio tapes or any other pictures, whether still or moving, regarding any aspect of the happening of the accident or of the injuries and disabilities incurred by the plaintiff.

13. If you allege the plaintiff made any written admissions or declarations against interest as to the happening of the accident or the injuries sustained in the accident, please produce copies of any document containing such admissions or declarations against interest.

14. If you allege that any of the plaintiff's medical treatment was unnecessary, unreasonable or not related to the accident/incident forming the basis of this complaint, please attach copies of all documentation upon which you will rely to support this allegation.

15. If plaintiff is asserting a loss wage claim and you allege that the plaintiff was not disabled for any of the period of time claimed, please attach copies of any documentation upon which your allegation is based.

16. If you allege that plaintiff had any pre-existing medical condition, please attach copies of any medical records or any other documentation upon which you intend to rely to support this allegation.

17. Please attach copies of all defense medical examinations.

18. Please attach copies of any medical examinations performed at the request of any person or entity not a party to this matter.

19. Please produce copies of any and all documents received from any subpoena or authorizations served in this matter.

20. Please attach copies of all written witness statements.

21. Please produce copies of any and all statements taken from any of your employees as a result of this accident.

22. Please produce copies of all statements taken by you, or anyone acting on your behalf, or by any party to this action, regarding the happening of this accident.

23. Please attach copies of any reports made to anyone concerning the incident which is the subject matter of this suit.

STARK & STARK
A Professional Corporation
Attorneys for Plaintiffs

By: Evan J. Lide
Evan J. LIDE

Dated: July 22, 2021

STARK & STARK
ATTORNEYS AT LAW

PLAINTIFF'S SUPPLEMENTAL FALL DOWN INTERROGATORIES

1. Did any defect, condition, foreign substance, or object on the defendant's premises cause or contribute to plaintiff's injuries?
2. Describe any condition, defect, substance, or object at or near plaintiff's accident, when first observed following said accident, as to size, shape, color, visibility, depth, composition or physical characteristics.
3. Did you or any agent, servant, or employee of the defendant ever prepare, submit, or make any written statements or report of the alleged occurrence? If so, attach said report hereto.
4. Describe in detail each action or activity of the plaintiff which you believe caused or contributed to plaintiff's accident as observed by you at the time of and during the accident, as well as your location during said observations.
5. How often are the grounds cleared, or otherwise maintained, as of the date of plaintiff's accident?

STARK & STARK
ATTORNEYS AT LAW

6. State the name and address of the individual or entity that supervises or directs the cleaning or ground maintenance as of the date of plaintiff's accident.
7. State the name and address of the employee or contractor who had cleaned or performed ground maintenance or inspections before plaintiff's accident in order to attempt to keep the premises in a reasonably safe condition and state the date and time of same.
8. How was the cleaning or ground maintenance referred to in the previous interrogatory accomplished (i.e. technique, manner, method or materials)?
9. Do you or any agent, servant, or employee of the defendant ever prepare, make, or otherwise keep a log or record of all regularly performed inspections and/or maintenance? If so, attach any such log or record for the date of the incident described in the complaint and for the seven days prior and subsequent to said date.
10. In accordance with the provisions of Rule 4:10-2(d), set forth the names and addresses of each person whom the defendant expects to call at trial as an expert witness, stating the subject matter on which the expert is expected to testify, the substance of the facts and opinions on which the expert is expected to testify, and the summary of the grounds for each opinion.

CERTIFICATION

I hereby certify that the copies of the reports annexed hereto rendered by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports rendered by them; that the existence of other reports of said doctors or experts, either written or oral, are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

I acknowledge my continuing responsibility to amend or supplement these answers as facts or information become known by my representative or me.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Please PRINT NAME of individual answering Interrogatories

SIGNATURE of individual answering Interrogatories

Dated:

Civil Case Information Statement

Case Details: MERCER | Civil Part Docket# L-001509-21

Case Caption: CARTER-MJUMBE KAYREN VS WALMART
INC

Case Initiation Date: 07/22/2021

Attorney Name: EVAN J LIDE

Firm Name: STARK & STARK PC

Address: 993 LENOX DR
LAWRENCEVILLE NJ 08648

Phone: 6098969060

Name of Party: PLAINTIFF : CARTER-MJUMBE, KAYREN

Name of Defendant's Primary Insurance Company
(if known): Walmart Claim Services

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Are sexual abuse claims alleged by: KAYREN CARTER-MJUMBE?
NO

Are sexual abuse claims alleged by: LUKATA MJUMBE? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

07/22/2021
Dated

/s/ EVAN J LIDE
Signed

